

III. REMARKS

Claims 1-18 are pending in this application. By this amendment, claims 1, 8 and 12 have been amended. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1-7 are rejected under 35 U.S.C. §112 as allegedly being indefinite. Claims 1-14 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Chouinard (U.S. Patent No. 6,671,701), hereafter "Chouinard," in view of Campbell *et al.* (U.S. Patent No. 6,856,970), hereafter "Campbell," and further in view of Brandt *et al.* (U.S. Patent No. 6,714,979), hereafter "Brandt." Applicants traverse the rejection for the following reasons.

A. REJECTION OF CLAIMS 1-7 UNDER 35 U.S.C. §112

The Office has asserted that claims 1-7 are indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Applicants have amended claim 1 to recite "...operating a database of the web-based application." Claims 2-7 depend from claim 1. Applicants assert that this amendment further clarifies the invention. Accordingly, Applicants request that the rejection be withdrawn.

B. REJECTION OF CLAIMS 1-18 UNDER 35 U.S.C. §103(a)

With regard to the 35 U.S.C. §103(a) rejection over Chouinard, Campbell and Brandt, Applicants initially assert that the combined features of the cited art fail to teach each and every feature of the claimed invention. For example, with respect to independent claims 1, 8 and 12 the cited references fail to teach or suggest that the document messages transfer information about the back office system. The Office equates the files of data in Chouinard with the document messages as included in the claimed invention. However, the files of data in Chouinard are statically stored in the file server and as such are not messages. Furthermore, the files of data in Chouinard do not transfer information about the back office system. Nowhere, does Chouinard teach receiving that its files of data are messages that transfer information about the back office system. In contrast, the claimed invention includes "...the document messages transfer information about the back office system." Claim 1. As such, the document messages of the claimed invention are not simply files in a static source directory as in Chouinard, but instead transfer information about the back office system. Furthermore, in contrast to the static nature of the Chouinard files, the document messages of the claimed invention are messages, and as such, are sent from one location to another. Thus, the document messages as included in the claimed invention are not taught or suggested by the files in a source directory in Chouinard. Neither Campbell nor Brandt cures this deficiency. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With still further regard to independent claims 1, 8 and 12, Applicants assert that the cited references fail to teach or suggest that the method is adapted to process the document messages in an appropriate time sequence even if the timestamp of the previously received document

message is more recent than the timestamp of the new inbound message. Instead, the passage in Chouinard cited by the Office teaches only that "...the date and time stamps of all of these source files are compared against the database that contains file name, data and time information for converted or destination files." Col. 2, lines 14-44. As such, Chouinard allows only one update of a particular file to be evaluated at a time. Chouinard makes no provision for the case of a file that is updated and then subsequently updated with the previous update received later than the subsequent update. In contrast, the present invention includes "...wherein the method is adapted to process the document messages in an appropriate time sequence even if the timestamp of the previously received document message is more recent than the timestamp of the new inbound message." Claim 1. As such the processing of the document message of the claimed invention does not merely process a single update of a particular file as in Chouinard, but rather is adapted to process the document messages in an appropriate time sequence even if the timestamp of the previously received document message is more recent than the timestamp of the new inbound message. Thus, the processing of the document messages as included in the claimed invention is not taught or suggested by the comparison of Chouinard. Neither Campbell nor Brandt cures this deficiency. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With regard to claims 2, 14 and 16, Applicants submit that, contrary to the Office's assertion, Chouinard fails to teach or suggest that the primary key comprises document type information and document identification information. Instead, the passage of Chouinard cited by the Office teaches that "...the date and time stamps of all of these source files are compared against the database that contains file name, date and time information for converted or destination files." Col. 2, lines 14-44. To this extent, the Chouinard database contains file name

and date and time information, but does not teach a primary key that includes both document type information and document identification information. Furthermore, Chouinard only teaches documents of one type, that is CAD documents, and Chouinard does not teach that this document type information is included in a primary key. Nowhere, in this passage or elsewhere does Chouinard teach or suggest a primary key that comprises document type information and document identification information. In contrast, the claimed invention includes "...the primary key comprises document type information and document identification information." Claim 2. As such, the primary key as included in the claimed invention is not simply a time and date stamp as in Chouinard, but instead includes both document type and document identification information. For the above stated reasons, the features of Chouinard cited by the Office are not equivalent to the primary key as included in the claimed invention. Neither Campbell nor Brandt cures this deficiency. Accordingly, Applicants request that the Office withdraw its rejection.

Furthermore, Applicants submit that there is no motivation to combine the Chouinard and Brandt references. One of the stated objects in Chouinard is to simplify and automate the file conversion process. Adding the database of Brandt would only add an additional component to the system without providing additional functionality, which is in opposition to Chouinard's stated goal of simplicity. Accordingly, the combination of the database in Brandt with the Chouinard system would destroy the stated purpose of Chouinard, namely, simplicity. In addition, neither Chouinard nor Brandt addresses the problem that is solved by the claimed invention, that is, synchronizing inbound messages to avoid the problems caused by messages arriving in a system in an incorrect order. Accordingly, the combination of Chouinard with Brandt to solve this problem is not obvious. For the above reasons, the Office has failed to

provide a *prima facie* case of obviousness. Accordingly, Applicants request withdrawal of the rejection.

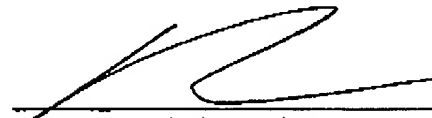
With regard to the Office's other arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims listed above. In addition, Applicants submit that all dependant claims are allowable based on their own distinct features. However, for brevity, Applicants will forego addressing each of these rejections individually, but reserve the right to do so should it become necessary. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

IV. CONCLUSION

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

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